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14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN JOSE DIVISION

17 UNITED STATES OF AMERICA,) No. CR 09-01119 JW
18 Plaintiff,) STIPULATION AND PROPOSED
19 v.) DISCOVERY PROTECTIVE ORDER
20 NORMAN BUETOW, et al.) BETWEEN THE UNITED STATES AND
21 Defendants.) ALL DEFENDANTS

22 Defendants Norman Buetow, Tony A. Yaymadzhyan, Susan Nahapetian, and Rudik
23 Avakyan, and the United States of America, by and through their counsel of records, hereby
24 agree and stipulate as follows:

25 1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal
26 Rules of Criminal Procedure, and its general supervisory powers.

27 2. This Order pertains to all discovery provided to or made available to defense
28 counsel as part of discovery in the above-cited case.

29 3. The discovery and information therein may only be used in connection with the
30 litigation of this case and for no other purpose. Defense counsel will return the discovery to the

government, or certify that has been shredded at the conclusion of the case.

1 4. Defense counsel shall not provide any of the discovery to any person other than
2 to their respective defendant/client, or attorneys, law clerks, paralegals, secretaries, experts and
3 investigators involved in the representation of his or her defendant/client, for the purpose of said
4 representation. Further, in disclosing discovery to defendants, personal information contained in
5 the discovery, including individuals' dates of birth, addresses (physical and email), telephone
6 numbers, social security numbers, and driver's license numbers, shall be redacted, and shall not
7 be provided to any defendant in any manner or form.

8 5. Defense counsel shall advise his or her respective defendant/client, employees,
9 other authorized members of the defense team and defense witnesses of the terms of this
10 stipulation and order, and that use of the subject discovery materials for a purpose other than in
11 connection with the litigation of this case may be subject to criminal sanctions.

12 6. Defense counsel will store the discovery in a secure place and will exercise due
13 diligence to ensure that it is not disclosed to third persons in violation of this agreement.
14 Similarly, if defense counsel make, or cause to be made, copies of any of the discovery, defense
15 counsel will exercise due diligence to maintain control of said copies and to ensure that said
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1 copies are stored in a manner to safeguard against the inappropriate use of said materials.

3 DATED: March 2, 2010

**JOSEPH P. RUSSONIELLO
United States Attorney**

4
5 /s/
6 EUMI L. CHOI
Assistant United States Attorney

7 _____/s/
8 FRED MINASSIAN, ESQ.
Attorney for Defendant Tony A. Yaymadzhyan

10 /s/
11 PAUL B. MELTZER, ESQ.
Attorney for Defendant Norman Buetow

12 /s/
13 GEORGE GEVORK MGDESYAN, ESQ.
Attorney for Defendant Susan Nahapetian

14 /s/
15 JOHN STANLEY, ESQ.
Attorney for Defendant Rudik Avakyan

ORDER

18 Based upon the stipulation of the parties, and for good cause shown, the Court
19 HEREBY ORDERS that the terms of the stipulation between the United States and all
20 defendants in this case pertaining to the discovery in this case be imposed.

21 || IT IS SO ORDERED.

23 DATED: *May 5, 2010*

Patricia V. Trumbull
PATRICIA V. TRUMBULL
UNITED STATES MAGISTRATE JUDGE